

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Derieon Thomas,)	
)	
Plaintiff,)	Case No. 22-cv-2026
)	
v.)	Honorable Steven C. Seeger
)	
Dart, et al.,)	
)	
Defendants.)	

UNOPPOSED MOTION FOR ENTRY OF QUALIFIED HIPAA PROTECTIVE ORDER

NOW COMES Defendant, LT. JAIME PHILLIPS, by and through his attorneys Jason E. DeVore and Zachary G. Stillman, DeVore Radunsky LLC, moves the Court to enter the proposed Unopposed Qualified HIPAA Protective Order. In support thereof, Defendant states the following:

1. Defendant's Counsel conferred with Plaintiff on October 24, 2023, regarding this Motion, and Plaintiff stated he does not oppose this motion.
2. Defendant now wishes to issue additional medical record subpoenas. Those records will be provided to Plaintiff upon Defendant's receipt of the same.
3. This discovery is expected to include protected health information ("PHI") as defined by 45 C.F.R. §§ 160.103.
4. HIPAA and its implementing regulations prohibit "covered entities," including medical care providers, from disclosing PHI in judicial proceedings other than by authorization or qualified protective order. 45 C.F.R. § 164.512(e).
5. In order to protect Plaintiff's confidential and personal records, pursuant to 45 C.F.R. § 160.103 and 164, Defendant respectfully requests that this Court enter a Qualified

Protective Order so that Plaintiff's medical records and related medical information may be obtained.

Wherefore, Defendant, LT. JAIME PHILLIPS, respectfully requests that this Court enter the Qualified Protective Order on behalf of the Defendant.

Respectfully Submitted:

/s/ Jason E. DeVore
Attorney for Defendant
Troy S. Radunsky (ARDC
#6242782)
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CERTIFICATE OF SERVICE

The undersigned, a law clerk, hereby certifies that he electronically filed the foregoing document on October 24, 2023, with the Northern District of Illinois ECF System, serving a copy to all parties.

/s/ Andrew H. Kim
Andrew H. Kim

PLAINTIFF

Derieon Thomas, Pro Se Plaintiff
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